

THE URBAN LAW FIRM

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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; TRUSTEES OF THE
NEVADA RESORT ASSOCIATION—
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720, WAGE
DISABILITY TRUST; and TRUSTEES OF
THE NEVADA RESORT ASSOCIATION—
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720, APPRENTICE
AND JOURNEYMAN TRAINING AND
EDUCATION TRUST

Plaintiffs

v.

RAMPARTS, LLC dba Luxor Hotel & Casino,
a Nevada limited liability company; NEW
CASTLE CORP. dba Excalibur Hotel &
Casino, a Nevada corporation; and CIRCUS
CIRCUS CASINOS INC. d/b/a CIRCUS
CIRCUS HOTEL & CASINO, a Nevada
corporation,

Defendants

CASE NO: 2:19-CV-01536-CDS-BNW

**STIPULATION FOR DISMISSAL WITH
PREJUDICE AND ORDER**

1 Plaintiffs, Trustees of The Nevada Resort Association—International Alliance of Theatrical Stage
2 Employees and Moving Picture Machine Operators of The United States and Canada, Local 720, Pension
3 Trust; Trustees of The Nevada Resort Association—International Alliance of Theatrical Stage
4 Employees And Moving Picture Machine Operators Of The United States and Canada, Local 720, Wage
5 Disability Trust; and Trustees Of The Nevada Resort Association—International Alliance of Theatrical
6 Stage Employees and Moving Picture Machine Operators of The United States And Canada, Local 720,
7 Apprentice and Journeyman Training and Education Trust (collectively hereinafter “Trusts” or
8 “Plaintiffs”), through their counsel, The Urban Law Firm, and Defendants, Ramparts, LLC dba Luxor
9 Hotel & Casino, New Castle Corp. dba Excalibur Hotel & Casino,¹ Circus Circus Casinos Inc. dba Circus
10 Circus Hotel & Resort, ² (“Defendants”) through their counsel Jackson Lewis P.C., hereby agree and
11 stipulate subject to the approval and Order of the Court, as follows:

12 1. A full and final settlement of the above-entitled action has been entered into and agreed
13 to by the parties. Therefore, the parties request this action be dismissed with prejudice.

14 2. The parties have executed a Settlement Agreement and Mutual Release setting forth the
15 terms of their agreement. The terms and conditions of the Settlement Agreement and Mutual Release,
16 and all documents referred to or attached thereto, are incorporated herein by this reference.

17 3. The parties have agreed to bear their own fees and costs.

18 4. The parties have agreed that this Court shall reserve and retain jurisdiction of this action
19 and the parties to enforce the terms of the Settlement Agreement and Mutual Release executed by the
20 parties herein.

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¹ Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.

28 ² The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as “dba Circus Circus Hotel & Casino.”

1 Dated this 14th day of December 2022.

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3 **THE URBAN LAW FIRM**

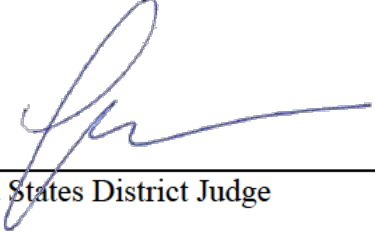
4 /s/ Michael A. Urban
5 Michael A. Urban, NV SBN 3875
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8 *Attorney for Plaintiffs*

JACKSON LEWIS P.C.

/s/ Lynne K. McChrystal
Paul T. Trimmer, NV SBN 9291
Lynne K. McChrystal, NV SBN 14739
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Attorneys for Defendants

8 IT IS SO ORDERED.

9 IT IS FURTHER ORDERED that the status conference set for December 20, 2022, at 10:00 AM
10 is vacated. The Clerk of Court is directed to close this case.

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United States District Judge

14 DATED: December 15, 2022
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